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*Attorneys for Defendant
Carrier IQ, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

*In re Carrier IQ, Inc. Consumer Privacy
Litigation*

[This Document Relates to All Cases]

Case No. C-12-md-2330-EMC

**STIPULATION AND ~~[PROPOSED]~~
ORDER FOR CONTINUANCE OF
TIME FOR DEFENDANTS TO FILE
MOTION(S) TO COMPEL
ARBITRATION AND REGARDING A
BRIEFING SCHEDULE**

STIPULATION

This Stipulation and ~~[Proposed]~~ Order is entered into by and between Plaintiffs' Interim Co-Lead Counsel and Defendants' counsel (collectively, the "Parties") as follows:

WHEREAS, the Court, in its July 16, 2012 Order appointing Interim Co-Lead Counsel

1 (Dkt. No. 100), set August 27, 2012 as the date by which Plaintiffs must file their Consolidated
2 Amended Complaint and October 11, 2012 as the date for Defendants to file their motions to
3 compel arbitration, if any;

4 WHEREAS, Defendants received from Plaintiffs information sufficient to identify
5 Plaintiffs' wireless phone service providers and account identifiers on August 30, 2012 and, since
6 that time, have worked diligently to obtain copies of Plaintiffs' service agreements and any
7 related arbitration agreements from their wireless phone service carriers;

8 WHEREAS, as of October 2, 2012, Defendants have not yet received from Plaintiffs'
9 wireless phone service carriers Plaintiff's service agreements and understand that the wireless
10 phone service carriers are continuing to collect Plaintiffs' wireless phone service agreements;

11 WHEREAS, the Parties have met and conferred in good faith regarding an extension of
12 time for Defendants to file their motion(s) to compel arbitration that will allow Defendants
13 sufficient time to receive and review Plaintiffs' wireless phone service agreement; and

14 WHEREAS, Plaintiffs anticipate serving discovery relating to Plaintiffs' arbitration
15 agreements following the filing of Defendants' motion(s) to compel arbitration;

16 NOW THEREFORE, the Parties, by and through their respective counsel of record,
17 hereby stipulate, subject to Court approval, as follows:

18 The deadline for Defendants to file their motion(s) to compel arbitration is continued from
19 October 11, 2012 to November 6, 2012;

20 Plaintiffs shall serve arbitration related discovery, if any, no later than November 20,
21 2012;

22 Defendants, without conceding in this Stipulation that Plaintiffs are entitled to any
23 arbitration related discovery, will serve their responses and objections to Plaintiffs' arbitration-
24 related discovery requests within 30 days of receiving the requests;

25 Plaintiffs' Opposition to Defendants' motion to compel arbitration shall be due within 40
26 days of the completion of arbitration discovery, or denial of any motions to compel arbitration
27 related discovery; and
28

Defendants' Reply, if any, in support of their motion(s) to compel arbitration shall be filed no later than 30 days after the filing of Plaintiffs' Opposition.

IT IS SO STIPULATED.

Dated: October 8, 2012

By: /s/ Steve W. Berman

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*Attorneys for Defendant Samsung
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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Tyler G. Newby, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF TIME FOR DEFENDANTS TO FILE MOTION(S) TO COMPEL ARBITRATION AND REGARDING A BRIEFING SCHEDULE.** In compliance with General Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

Dated: October 8, 2012

/s/ Tyler G. Newby

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[PROPOSED] ORDER

Pursuant to stipulation, it is SO ORDERED.

Dated: October 10, 2012



Honorable Edward M. Chen
United States District Judge